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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*K.O. and J.O., individually and as next of  
friend to minor D.O. v. Meta Platforms,  
Inc., et al., 4:23-cv-04255*

*K.P., individually and as next of friend to  
minor S.P. v. Meta Platforms, Inc., et al.,  
4:23-cv-05794*

*I.T. individually and as next of friend to  
minor, A.P. v. Meta Platforms, Inc., et al.,  
4:23-cv-03292*

**DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL EXHIBITS TO THE  
DECLARATION OF JENNIE LEE  
ANDERSON IN SUPPORT OF PLAINTIFFS'  
EIGHTH CONSOLIDATED *EX PARTE*  
APPLICATION FOR APPOINTMENT OF  
GUARDIANS *AD LITEM***

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*

1 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of  
 2 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I  
 3 make this declaration of my own personal knowledge and, if called as a witness, I could and  
 4 would testify competently to the matters stated below.

5 2. I make this declaration in support of Plaintiffs' Administrative Motion to File  
 6 Under Seal Exhibits to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Eighth  
 7 Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Administrative  
 8 Motion to Seal").

9 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on  
 10 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs  
 11 seek to seal the Exhibits attached to the Declaration of Jennie Lee Anderson in Support of  
 12 Plaintiffs' Eighth Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*  
 13 ("Anderson Declaration").

14 4. True and correct copies of the following Exhibits to the Anderson Declaration  
 15 are as follows and attached hereto:

- 16 • *K.O. and J.O., individually and as next of friend to minor D.C. v. Meta Platforms, Inc., et*  
 17 *al.*, 4:23-cv-04255 (Exhibit 1);
- 18 • *K.P., individually and as next of friend to minor S.P. v. Meta Platforms, Inc., et al.*, 4:23-  
 19 *cv-05794* (Exhibit 2); and
- 20 • *I.T. individually and as next of friend to minor, A.P. v. Meta Platforms, Inc., et al.*, 4:23-  
 21 *cv-03292* (Exhibit 3).

22 5. Pursuant to Civil Local Rule 7-11, on June 15, 2023, Defendants agreed to a  
 23 standing stipulation that the individual applications seeking appointment of guardians *ad litem* in  
 24 this litigation may be filed under seal. Defendants also confirmed that, in so stipulating,  
 25 Defendants do not waive, and expressly reserve, their right to seek an order or orders in the future  
 26 to unseal individual applications and/or require parents who wish to proceed pseudonymously  
 27 going forward make a showing of good cause.

28 I declare under penalty of perjury pursuant to the laws of the United States of America that

1 the foregoing is true and correct.

2  
3 Dated: February 23, 2024

Respectfully submitted,

4 /s/Jennie Lee Anderson  
5 Jennie Lee Anderson  
6 *Plaintiffs' Liaison Counsel*

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